

UNITED STATES DISTRICT COURT
FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

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JUN 30 2014

U. S. DISTRICT COURT
MID. DIST. TENN.

MICHAEL BRANDON ADAMS,
PLAINTIFF,

Vs.

JASON WOODALL, ET AL.
DEFENDANTS.

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CASE No. 3:14-cv-0020

JUDGE TODD CAMPBELL/JOE BROWN)

MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION

COMES NOW, the Plaintiff, *Michael Brandon Adams*, in *Propria Persona* and pursuant to **Rules 10 and 65(a) of Federal Rules of Civil Procedure**, moves this Honorable Court for a Temporary Restraining Order and Preliminary Injunction on his behalf against the named Defendants in the above-styled case.

Plaintiff humbly requests that this Honorable Court enjoin the said Defendants, their successors in office, agents, and employees and all other persons acting in concern and participation with them, to allow Plaintiff the following:

(A.) The ability to receive religious items/property (including necklace, ring, prayer shawl, prayer rug, kufis, prayer beads, miswak sticks, hygiene products & prayer oils) directly from the following Islamic/Halal Vendors: **Halalco Books** (155 Hillwood Avenue, Falls Church, Virginia 22046); **Medina Industrial Corporation** (568 Atlantic Avenue, P.O. Box 170612, Brooklyn, New York 11217; Telephone-1-800-887-2368); **Exotic Fragrances, Inc.** (1645 Lexington Avenue, New York, New York 10029; Telephone-212/410-0600); **IslamicBookstore.com** (3940 Bank Street, Baltimore, Maryland 21224-2522; Telephone-

410/675-0040); **The Islamic Place** (5225 Chestnut Street, Philadelphia, Pennsylvania 19139; Telephone-215/748-3333); **Crescent Imports & Publications** (P.O. Box 7827, Ann Arbor, Michigan 48107-7827-1-800-521-9744) and/or be allowed to have these items donated to him by **Masjid al-Farooq** (1421 4th Avenue South, Nashville, Tennessee 37212; Telephone-615/313-8844) and **Al-Aml Nonprofit Organization** (721 Glenview Drive, Nashville, Tennessee 37206);

(B.) To allow Plaintiff the ability to receive prepackaged Halaal meals from the following Islamic/Halaal Vendor: **Halalco Books** (155 Hillwood Avenue, Falls Church, Virginia 22046) or in the alternate the Plaintiff be allowed to be approved and provided an actual Halaal diet by Food Service at Charles Bass Correctional Complex (and subsequently any other institution in which the Plaintiff may be transferred pending the disposition of the actual case) consisting of the following: (1) **Fish, Tuna Salad, Peanut Butter and Vegetable Burgers** in the place of the main protein item (No Chicken Patties, Turkey Ham, Turkey, Bologna, Polish Sausage, Chuckwagon Patty, Sausage, Hot Dogs, Corn Dogs, etc. at all); (2) Two (2) Fruits (Apples, Oranges, Bananas, Sliced Peaches, Sliced Pears, etc.); (3) Two (2) Vegetables and (4) Bread with every meal due to the fact that the so-called *Halaal* Menu that is currently in affect consists of nothing more than **alternatives** that are located as designated **alternatives** on the regular Master Menu and still includes ingredients that are considered as being *Haraam* (prohibited/forbidden); which is the basis of the Plaintiff's actual complaint; and

(C.) To allow the Plaintiff to be provided *Halaal* food products during the Holy month of Ramadaan and at the conclusion of the Holy month of Ramadaan that according to the tenets of al-Islam instead of forcing the Plaintiff to eat of the "feast" meal from a generalized menu which also consists of the *Haraam* food ingredients which are the underlying basis for the actual complaint.

In conclusion, Plaintiff contends that requested Temporary Restraining Order and Preliminary Injunction be issued by this Honorable Court in the interest of justice and the protection of his constitutional rights.

Respectfully Submitted,



Mr. Michael Brandon Adams, Plaintiff

CERTIFICATE OF SERVICE

I, Michael Brandon Adams, hereby certify that a **TRUE** and **EXACT** copy of the foregoing has been forwarded, by first-class mail, postage pre-paid, this the 26th day of June 2014 to:

Mr. Keith Throckmorton;
Clerk of Court
United States District Court,
Middle District at Nashville
801 Broadway
Room 800
US Courthouse
Nashville, Tennessee 37203

Mrs. Jennifer L. Brenner,
Senior Counsel
Civil Rights & Claims Division
Office of the Attorney General & Reporter
P.O. Box 20207-0207


Mr. Michael Brandon Adams

Mr. Michael B. Adams #579294
cc:cc
474 Carroll Blvd
Nashville, Tennessee 37245

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W. Keith Thompson
Clerk of Court
U.S. District Court - Middle District
801 Broadway
Room 200
Nashville, Tennessee 37203

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